

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

EMERSON ELECTRIC CO.,	)	
	)	
	)	<i>Plaintiff,</i>
	)	
v.	)	C.A. No. 17-cv-01846-LPS-JLH
	)	
EMERSON QUIET KOOL CO. LTD., and	)	
HOME EASY LTD.,	)	
	)	<i>Defendants.</i>

**MOTION FOR TELECONFERENCE TO RESOLVE DISCOVERY DISPUTE**

Defendants Emerson Quiet Kool Co. Ltd. and Home Easy Ltd. respectfully move this Court to schedule a teleconference to address an outstanding dispute regarding the following discovery matter:

- Whether Plaintiff may withhold, under an asserted Common Interest Privilege, communications between Plaintiff and non-Party Emerson Radio Corp.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confer (by telephone) on the following date: July 30, 2020.

For Plaintiff: Adam W. Poff (Delaware Counsel), George D. Moustakas (Lead Counsel), Joel R. Samuels

For Defendants: John D. Simmons (Delaware and Lead Counsel), Keith A. Jones

The parties are available for a teleconference on the following dates: September 16, 17, and 18, 2020.

Respectfully submitted,

**PANITCH SCHWARZE BELISARIO & NADEL, LLP**

Dated: August 21, 2020

Of Counsel:

Keith A. Jones (*pro hac vice*)  
Panitch Schwarze Belisario & Nadel LLP  
Two Commerce Square  
2001 Market Street, Suite 2800  
Philadelphia, PA 19103  
Telephone: (215) 965-1330  
[kjones@panitchlaw.com](mailto:kjones@panitchlaw.com)

By: John D. Simmons

John D. Simmons (Bar No. 5996)  
Dennis J. Butler (Bar No. 5981)  
Wells Fargo Tower  
2200 Concord Pike, Suite 201  
Wilmington, DE 19803  
Telephone: (302) 394-6030  
[jsimmons@panitchlaw.com](mailto:jsimmons@panitchlaw.com)  
[dbutler@panitchlaw.com](mailto:dbutler@panitchlaw.com)

*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 21, 2020, a true and correct copy of the foregoing Motion for Teleconference to Resolve Discovery Dispute was served upon the following via ECF

Notification:

George D. Moustakas  
Lisa M. DuRoss  
HARNES, DICKY & PIERCE PLC  
5445 Corporate Drive, Suite 200  
Troy, MI 48098  
248-641-1600  
[gdmoustakas@hdp.com](mailto:gdmoustakas@hdp.com)  
[lduross@hdp.com](mailto:lduross@hdp.com)

Joel R. Samuels  
HARNES, DICKY & PIERCE PLC  
7700 Bonhomme Ave., Suite 400  
Clayton, MO 63105  
314-726-7509  
[jsamuels@hdp.com](mailto:jsamuels@hdp.com)

Adam W. Poff (No. 3990)  
Robert M. Vrana (No. 5666)  
YOUNG CONAWAY STARGATT & TAYLOR, LLP  
Rodney Square  
1000 North King Street  
Wilmington, DE 19801  
302-571-6600  
[apoff@ycst.com](mailto:apoff@ycst.com)  
[rvrana@ycst.com](mailto:rvrana@ycst.com)

*/s/ John D. Simmons*

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John D. Simmons